

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

**LARRY AND KANDICE WILSON,**

**Plaintiffs,**

**VS.**

**No.**

**JURY DEMANDED**

**NATIONWIDE PROPERTY AND  
CASUALTY INSURANCE COMPANY,**

**Defendants.**

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**NOTICE OF REMOVAL**

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Defendant Nationwide Property and Casualty Insurance Company, ("Nationwide"), hereby notifies the Judges of the United States District Court for the Middle District of Tennessee, the clerk of the Circuit Court of Davidson County, Tennessee and Plaintiffs, Larry and Kandice Wilson, that the action described herein and filed in the Circuit Court of Davidson County, Tennessee, is removed to the United States District Court for the Middle District of Tennessee, Nashville Division pursuant to 28 U.S.C. § 1441.

1. On April 25, 2016, Plaintiffs, Larry and Kandice Wilson, filed a civil action bearing Docket No. 16C1148, against the Defendant, Nationwide Property and Casualty Insurance Company, in the Circuit Court of Davidson County, Tennessee. Service of the complaint and summons was made upon CT Corporation, the designated statutory agent of the Defendant, on May 6, 2016, by certified mail through the Department of Insurance of the State of Tennessee.

2. This action is filed by Plaintiffs for proceeds allegedly due under a contract of insurance written by Defendant Nationwide and insuring Plaintiffs' real property and contents in Davidson County, Tennessee which was allegedly suffered damage on or about April 23, 2015. Plaintiffs also make claims of statutory bad faith and violation of the Tennessee Consumer Protection Act.

3. Petitioner seeks removal of this action to this Court upon the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-five Thousand Dollars (\$75,000.00), exclusive of the interest and costs, 28 U.S.C. § 1332 as Plaintiffs have demanded an award not to exceed Six Hundred and Fifty Thousand Dollars (\$650,000.00).

4. Plaintiffs, Larry and Kandice Wilson, are a resident and citizen of the State of Tennessee and were citizens of the State of Tennessee at the time of the filing of this action and at the time of removal. Defendant Nationwide is a corporation incorporated in Ohio, with its principal place of business in Columbus, Ohio. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

5. This notice is filed within the time prescribed by 28 U.S.C. §1446(b).

6. A copy of the Summons and Complaint, being all the papers served upon the Defendant, is attached hereto.

WHEREFORE, Notice is hereby given that the said civil action number 16C1148 is removed from the Circuit Court of Davidson County, Tennessee, to this Court.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

s/ Russell E. Reviere

Russell E. Reviere (BPR No. 07166)

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was forwarded first class U.S. Mail, postage prepaid to Sonya Wright, 122 North Church Street, Murfreesboro, Tennessee 37130, counselor of record for Plaintiffs, and/or by electronic means via the Court's electronic filing system.

This the 197th day of May, 2016.

s/ Russell E. Reviere